

# Exhibit D

## CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

RIDGEVIEW MEDICAL CENTER AND CLINICS

#2966

SUBJECT: SOCIAL MEDIA

ORIGINATING DEPT: Community Relations

DISTRIBUTION DEPTS: All

**ACCREDITATION/REGULATORY STANDARDS:**

Original Date: 7/09

Revision Dates: 8/15

Reviewed Dates: 7/12

**APPROVAL:**

Administration: \_\_\_\_\_

Director: \_\_\_\_\_

**GENERAL:**

Internet access and use at Ridgeview Medical Center and Clinics is a privilege and must be carried out in a manner that is consistent with employees' job responsibilities and Human Resources policies addressing appropriate use. Access to the Internet by workforce members (workforce includes employees, providers and clinicians with privileges, volunteers and others with approved access to Ridgeview systems) is supported at the enterprise level and is provided through IT platforms (managed by Ridgeview's MIS Department) to all workforce members through available devices.

Ridgeview Medical Center and Clinics supports the appropriate use of social media sites by its workforce members. Social media sites can facilitate communication, education and collaboration among users, as well as provide resources and services that improve work quality and job satisfaction. However, there are risks associated with inappropriate use of social media sites that must be addressed through appropriate policies, safeguards, education and corrective action when necessary.

**PURPOSE:**

The purpose of this policy is to provide Ridgeview Medical Center and Clinics' employees and workforce members with guidelines for participation in social media sites hosted by Ridgeview Medical Center and Clinics, and in other social media sites in which an employee's affiliation with Ridgeview Medical Center and Clinics is known, identified or presumed. This policy is not intended to restrict the flow of useful and appropriate information.

Ridgeview Medical Center and Clinics reserves the right to restrict and monitor use of social media if such usage is contrary to the guidelines outlined in this policy.

While Ridgeview Medical Center and Clinics attempts to provide reasonable guidelines, as new opportunities and challenges emerge, these guidelines are subject to change. These restrictions are intended to ensure compliance with legal and regulatory restrictions, and privacy and confidentiality agreements.

**DEFINITIONS:**

- **Institutional Use:** Use of a social media site that is in the name of, sanctioned by or using the identity of Ridgeview Medical Center and Clinics that has been authorized by an employee's manager or the Ridgeview Medical Center and Clinics' Marketing/Community Relations Department.
- **Personal Use:** Use of a social media site that is not in the name of, sanctioned by or using the identity of Ridgeview Medical Center and Clinics that has been authorized by an employee's manager or the Ridgeview Medical Center and Clinics' Marketing/Community Relations Department.
- **Social Media:** Includes, but is not limited to, blogs, podcasts, discussion forums, online collaborative information and publishing systems that are accessible to internal and external audiences (e.g., wikis), RSS feeds, video sharing and social networks such as Facebook, Twitter, Instagram and LinkedIn.

Any questions about the above guidelines regarding Institutional Use of social media sites shall be directed to the Marketing/Community Relations Department or an employee's manager as appropriate.

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## POLICY:

I. General Restrictions

- A. The following information must never be disclosed during an employee's Institutional Use or Personal Use of a social media site or other online forum:
1. Information about Ridgeview Medical Center and Clinics' patients.
  2. Confidential or proprietary business information that employees would not have access to if not for their employment at Ridgeview Medical Center and Clinics.
  3. Information regarding legal issues related to Ridgeview Medical Center and Clinics.
- B. **Copyright Laws:** Employees may not post content created by another party without obtaining permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.

II. Institutional Use of Social Media Sites

- A. All Institutional Use of social media must be authorized by and executed in collaboration with the Marketing/Community Relations Department or an employee's manager.
1. There can be no Ridgeview Medical Center and Clinics sites or pages on YouTube, Twitter, Facebook, LinkedIn, Google+ or other social media sites unless they are developed or authorized by the Marketing/Community Relations Department. Any existing sites or pages must be reviewed by the Marketing/Community Relations Department and may be amended or removed.
  2. The Marketing/Community Relations Department or an employee's supervisor will identify person(s) to be content owners of various Ridgeview Medical Center and Clinics social media sites.
- B. Ridgeview's Marketing/Community Relations Department will serve as the primary administrator for social media pages hosted in Ridgeview's name.
- Ridgeview will acknowledge and correct mistakes promptly. Employees will work with the Marketing/Community Relations Department to strive for accurate posts, responses and comments.
  - Ridgeview's Marketing/Community Relations Department will routinely monitor posts and will report any signs of noncompliance by employees to managers and/or administration.
  - On sites that Ridgeview can control, Ridgeview's Marketing/Community Relations Department will strive to maintain a social media presence that accurately reflects Ridgeview's brand identity.
  - When corrections are made, Ridgeview will preserve the original post, while visibly indicating changes, to maintain integrity.
  - Ridgeview will delete spam and/or comments that are off topic or slanderous.
  - Ridgeview will reply to emails and comments when appropriate.
  - Ridgeview will link directly to online references and original source materials.
- C. For Institutional Use of social media sites, employees shall observe the following:
1. **Payment:** If an individual or group offers to pay an employee for participating in an online forum related to the employee's role at Ridgeview Medical Center and Clinics, this could constitute a conflict of interest and relevant policies and guidelines apply.
  2. **Community:** Employees that identify themselves as part of the Ridgeview Medical Center and Clinics community on a social media site shall be aware that they may be construed as representing their colleagues, managers, and even Ridgeview Medical Center and Clinics' patients and donors.
  3. **Media Relations:** If an employee is contacted by a member of the accredited media about a posting or comment on a social media site, the employee must contact the Marketing/Community Relations Department before responding.

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4. **Content Owners:** Content owners will be directed by the Marketing/Community Relations Department and are responsible for monitoring and maintaining the content of social media sites in the following manner. *Content owners will:*
  - Ensure content is current, accurate and authentic;
  - Refrain from engaging in communications that would not be acceptable in the workplace;
  - Link to original source material and online references where appropriate;
  - Refrain from revealing proprietary financial, intellectual property, patient care, or similar sensitive or private information;
  - Be aware that any social media communication may be subject to public records law requests and such requests should be directed to Ridgeview Medical Center and Clinics' legal counsel; and
  - Be responsive when patients, customers or employees ask a question, and respond in a timely manner.
5. **Copyright Laws:** Employees may not post content created by another party without obtaining permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.

**III. Personal Use of Social Media Sites**

- A. **Use a personal email address (not your ridgeviewmedical.org address) as your primary means of identification:** Just as you would not use Ridgeview stationery for a letter to the editor or communication with an elected official to express your personal views, do not use your Ridgeview email address for personal views.
- B. **Use a Disclaimer:** If an employee uses social media and their affiliation with Ridgeview Medical Center and Clinics is apparent, the employee should include a disclaimer that the views expressed are the employee's own and do not reflect the views of Ridgeview Medical Center and Clinics.  
If your social media or other online activities are inconsistent with, or would negatively impact Ridgeview's reputation or brand, you should not refer to Ridgeview, or identify your connection to Ridgeview.
- C. **Graphics:** Employees may not use Ridgeview Medical Center and Clinics' logos, trademarks or proprietary graphics that create the appearance they are speaking on behalf of Ridgeview Medical Center and Clinics.
- D. **Disclosure:** If an employee uses social media to communicate about Ridgeview Medical Center and Clinics or Ridgeview Medical Center and Clinics-related matters, the employee should disclose their affiliation with Ridgeview Medical Center and Clinics.
- E. **Personal Use of Social Media During Work Hours:** Employees shall ensure their social media activities do not interfere with job functions. Incidental use of social media during break times or in a manner that is consistent with general Internet use is not prohibited by this policy.
- F. **Ridgeview Medical Center and Clinics strongly discourages employees from "friending," "following" or otherwise joining the social media networks of patients.** Employees in patient care roles generally should not initiate or accept such requests except in unusual circumstances, such as if a prior friendship pre-dates the patient-caregiver relationship.
- G. **Ridgeview Medical Center and Clinics discourages employees in management/ supervisory roles from initiating "friend" requests with employees they manage.** Supervisors may accept friend requests that are initiated by employees if the supervisor does not believe it will negatively impact the professional relationship.
- H. **Ask the Marketing/Community Relations Department if you have any questions about what is appropriate to include in your social networking profile, blog or other online activity.** Remember that if you wouldn't want your supervisor or others at Ridgeview to see your comments, it is unwise to post them to the Internet.

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**CONSEQUENCES:**

The inappropriate use of social media sites by employees that conflicts with Ridgeview Medical Center and Clinics' mission and values, violates enterprise administrative policies and procedures, and/or compromises the privacy and security of confidential patient health or proprietary business information shall be subject to corrective action, up to and including termination. In addition, breach of confidential patient health information may also be subject to legal proceedings and/or criminal charges.

This policy is supplemented by other Ridgeview Medical Center and Clinics policies and procedures. All policies related to patient privacy and confidentiality are located on RidgeNet (the Ridgeview Medical Center and Clinics intranet).

Among the policies most pertinent to this policy are:

1. Policy #2816 - *Internet/Intranet and E-mail Policy and Guidelines*
2. Policy #2845 - *Release of Patient Information to the Media and General Public and Overall Process for Handling All Media Inquiries and Situations*
3. Policy #2617 - *Privacy of Protected Health Information*

All Ridgeview Medical Center and Clinics policies and procedures shall adhere to standards established by international conventions, federal, state, and local laws and regulations.